R04-20-C-002

THE CITY OF DOTHAN, ALABAMA

POST OFFICE BOX 2128 · **DOTHAN**, ALABAMA 36302 · 334-615-3000

December 2, 2019

BOARD OF COMMISSIONERS

MARK SALIBA
PRESIDENT/MAYOR

KEVIN DORSEY
COMMISSIONER, DISTRICT 1

JANASKY FLEMING
COMMISSIONER, DISTRICT 2

ALBERT KIRKLAND
COMMISSIONER, DISTRICT 3

JOHN FERGUSON
COMMISSIONER, DISTRICT 4

BETH KENWARD
COMMISSIONER, DISTRICT 5

DAVID L. CRUTCHFIELD
COMMISSIONER, DISTRICT 6

CITY MANAGER
KEVIN COWPER

Brownfields Cleanup Grant Application – Hazardous Substances
Former Electrical Substation Site
Corner of Linden and Whiddon Street
Dothan, Houston County, Alabama

The City of Dothan, Alabama, is submitting this proposal for an EPA Brownfields Cleanup Grant for the removal of hazardous substances from the former electrical substation site located adjacent to Aunt Katie's Community Garden, 602 Linden Street, Dothan, AL 36303. The City is requesting $297,000 to remove hazardous substances (arsenic) from the soil.

Preliminary information on our project is as follows:

1. Applicant Identification: City of Dothan, Alabama
126 North Andrews Street
Dothan, Alabama 36303-4838

2. Funding Requested:
   a) Grant Type: Single Site Cleanup
   b) Federal Funds Requested:
      i). $297,000
      ii) No cost share waiver requested
      iv) Contamination: Hazardous Substances

3. Location: Corner of Linden and Whiddon Street, Dothan, AL

4. Property Information: Former Electrical Substation, Corner of Linden and Whiddon Street, Dothan, AL 36303

5. Contacts:

a) Project Director
Robert (Bob) Wilkerson
Planner II, Planning and Development
126 North Andrews St.,
Dothan, AL 36303
bwilkerson@dothan.org
Phone: (334)615-3415

b) Chief Executive
Mark Saliba
Mayor of Dothan
126 North Andrews St.
Dothan, AL 36303
mayor@dothan.org
Phone: (334)615-3310

6. Population: 68,247

7. Other Factors Checklist:

Other Factors	Page #
None of the Other Factors are applicable.	
Community population is 10,000 or less.	5*
Applicant is, or will assist, a federally recognized Indian tribe or United States	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	4,5
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site is in a federally designated flood plain.	
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	

** Note: City has population >10,000, but the "target community" has 2,200.*

8. Letter from the State or Tribal Environmental Authority: A support letter from the Alabama Department of Environmental Management is included as Attachment A, followed by the narrative proposal (Attachment B) and Threshold Criteria (Attachment C). We are confident that our application has been prepared in accordance with your guidelines, and that our project represents an excellent candidate for funding. We look forward to hearing from you soon, and working with you as we continue to build on the momentum already established in our existing brownfields program.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a Target Area and Brownfields

i. Background and Description of Target Area: The City of Dothan (population 68,202) is located in Houston County in the extreme southeast corner of Alabama. Originally established on timber harvesting, the Dothan economy became a leader in cotton agriculture before the boll weevil insect decimated the cotton crops in 1910. The area turned to production of peanuts and, with the help of George Washington Carver, became known as the "Peanut Capital of the World". Dothan's post-World War II economy transitioned to include significant industrial production, and regional retail shopping, as well as a major rail corridor serving southeast Georgia, northwest Florida and southeast Alabama. US Highway 231, which passes through the heart of the City, became a major route for vacationers from across the Southeast to the beaches along the Florida Gulf Coast, thereby facilitating the construction of the Ross Clark "Circle" bypass around the City to alleviate traffic strain on the downtown area. However, over the years, it seems the Circle has become more of a boundary that divides the City. New residential and retail development occurs primarily outside the Circle, causing a classic case of suburban sprawl.

The *"Inside the Circle"* downtown area has slowly declined, with the worst impacts felt by the ***Baptist Bottom neighborhood*** covered by US Census Tract 406 (described in detail in *Section 2*), which is **the target area** where this cleanup grant will be utilized. The ***Baptist Bottom target area*** draws its name from early residents who occupied the neighborhood, made up of African American citizens primarily of the Baptist faith, living in the less desirable, low topographical area of the City due to its undesirable flood-prone characteristics. The Baptist Bottom target area consists of 300 acres, roughly bounded by Montgomery Highway to the north, North Park Avenue to the west, West. Burdeshaw Street to the south and Oates Street to the east. The poor economic, environmental, and health conditions and associated brownfields in the *Baptist Bottom* target area helped in award of an EPA Brownfields Community-Wide Assessment Grant in 2017 (Cooperative Agreement No. BF-00D58117). This seed money has been used to assess numerous brownfield sites in the *Baptist Bottom* distressed neighborhood and to prioritize sites for cleanup and redevelopment. The potential for economic stimulus as a result of these redevelopments is high, as several sites in the target area have already attracted interest from private businesses and the City. In addition, the Wiregrass Foundation, a local successful non-profit dedicated to community development, has keen interest in the target area and are willing to invest/finance in this community for projects such as a learning center, library, health facility, etc. Creating "stability and sustainability" through education is a primary goal for the organization, as they believe that is a key to elevating people out of poverty.

One of the sites already assessed with EPA Assessment Grant funds in *Baptist Bottom* is an arsenic-contaminated former electrical substation site, the **priority/target brownfield** that is the focus of this grant proposal. This brownfield site is located adjacent to the non-profit ***Aunt Katie's Community Garden.*** The Garden, in operation for the past 9 years, has become an institution within the *Baptist Bottom*, providing fresh food, environmental education, mentoring of disadvantaged youths, and a beacon of inspiration and hope for residents left behind in a long decline of the surrounding neighborhood. Named for Katie Hayes Kirkland who lived across the street from the Community Garden until her recent death at the age of 97, the Garden actually carries on her decades of community service as one who fed the hungry from her home on Sunday afternoons. If awarded a cleanup grant, the City of Dothan will complete remediation of the former substation site and position the Community Garden to take ownership which will provide for significant expansion of Garden production. This expansion onto the *priority brownfield site* will enable *Aunt Katie's Community Garden* to be a self-sustaining operation by providing fresh greens to local restaurateurs and others on a year-round basis. Achievement of *economic sustainability* will stabilize the reach and impact of the Garden's well-established social and educational outreach programs and its status as an anchor for revitalization and creation of healthy lifestyles within the *Baptist Bottom* neighborhood. This project represents an excellent candidate for funding under the EPA brownfields program, as it will result in redevelopment of a contaminated site into greenspace that engages the local residents in the process of growing healthy organic foods, while fostering a model for economic progress in the long overlooked *Baptist Bottom* neighborhood.

ii. Description of the Brownfield Site: The target property for cleanup, a former electrical substation owned by the City since 1957, consists of a 0.15-acre vacant parcel at the intersection of Whiddon and Linden Streets in the *Baptist Bottom* target area. The property was developed and used as an electrical substation by Alabama Power from 1961 until at least 1997, and has remained vacant since that time. The property is primarily covered with grass, except for the center of the site where vegetation refuses to grow. This former electrical substation is located immediately adjacent to the existing *Aunt Katie's Community Garden*. Dothan used the current Assessment Grant funding to conduct Phase I and II Environmental Site Assessments (ESAs) on the property to evaluate site conditions. The surrounding *Baptist Bottom* neighborhood properties have been residential since at least 1920, except for the adjoining property to the south which was previously occupied by a store/restaurant (now occupied by *Aunt Katie's Community Garden*, which was developed in 2010). *Baptist Bottom* pedestrians, including children, frequently walk across the site and play on the property. Baptist Bottom has a proud history as a once-stable and sustaining minority neighborhood. Cottage houses with sidewalks and tree-lined streets once made this a desirable place to live. The neighborhood was filled with markets, shops, and churches serving the neighborhood residents as a highly walkable community. Since the mid-1960's, *Baptist Bottom* has suffered loss of residents, businesses, property values, and property conditions. *Aunt Katie's Community Garden* has pioneered revitalization while giving residents a sense of hope that additional improvements will cluster around the Garden and help return *Baptist Bottom* to the desirable and economically sustainable neighborhood it once was.

Soils in the center of the target property are exposed and have been unable to support the growth of vegetation since the removal of the substation around 1997. The reason for the exposed soil is unknown, but this condition may be

a residual effect of the substation. A release was never reported at the site; however, the period of substation operation overlapped the periods that polychlorinated biphenyl (PCB)-transformers were likely in use and before any regulatory oversight was in place. In July 2018, using funds from the City's Brownfield Assessment Grant, nine borings were advanced at the site, and soil samples were screened for the presence of PCBs and tested by a laboratory for volatile and semi-volatile organic compounds (VOC/SVOCs) and metals. The results were compared to EPA Regional Screening Levels (RSLs). Minor concentrations of PCBs were detected via field screening, but none were found during laboratory testing. VOCs were not detected. SVOCs were detected in several of the soil samples, but only the sample located at the center of the property had concentrations that exceeded Residential RSLs (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and indeno(1,2,3-cd) pyrene), which are all polynuclear aromatic hydrocarbons (PAHs). PAHs can be ubiquitous to long-settled urban properties due to the combustion of petroleum fuels and runoff from city streets; however, the location of the elevated PAHs in the center of the property indicates an onsite source. A possible source that may be associated with the property's past use as an electrical substation may be the use of heavy oils in machinery or wood materials treated with creosote.

Arsenic was the only RCRA metal detected with concentrations (<0.37 mg/kg to 1,100 mg/kg) exceeding Residential RSLs. Arsenic is naturally-occurring in the eastern United States at a mean concentration of 7.4 mg/kg. While it is possible that some of the arsenic concentrations represent naturally-occurring background concentrations, the higher detected concentrations (up to 1,100 mg/kg) are indicative of an anthropogenic source, especially since elevated PAH concentrations were found in this same area. Groundwater was not encountered at the site in borings advanced to 40 feet; therefore, threats to groundwater are considered minimal.

Although there is no obvious use of arsenic associated with electric substations, a possible explanation may be that arsenic was used to control rodents in an effort to minimize potential damage to electrical lines, or as an herbicide to control weeds. It is also possible that the arsenic is associated with use of wood products treated with copper-chromium-arsenic (CCA), which would explain the elevated PAH concentrations as well. In both cases, shallow soils are impacted. Arsenic applied to loose sandy surface soils could leach into deeper subsurface soils as evidenced by generally greater concentrations in deeper clayey soils.

These findings indicate that the primary contaminant of concern (COC) at the site is arsenic, which is likely above RSLs over the entire property to a depth of 4 feet. The arsenic appears to have leached from the surface through the loose, sandy surface soils to deeper subsurface clayey soils where it was able to accumulate. Groundwater was not encountered during the Phase II ESA; therefore, site-specific groundwater flow direction could not be determined. Based on topography of the area, groundwater is believed to flow southeast toward a nearby small stream approximately 300 feet from the site. The real concern is the potential for dermal, inhalation and ingestion of contaminants by local residents and workers at the Garden once it expands onto the property. The area of impact is estimated at 6,795 square feet, to at least 4 feet in depth, and cleanup of this area is the focus of this cleanup grant application.

While the Baptist "*Bottom*" is not currently in a federally designated floodplain, it is so named for the low topographic profile of the area that once experienced significant flooding. Over the past, the City has invested in improved storm water infrastructure in the neighborhood which has eliminated the frequency of flooding and sewer overflows.

1.b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: After cleanup, the community plans to expand the footprint of the adjacent *Aunt Katie's Community Garden* onto the property. The Garden, established in 2010, was developed by the *Dubois Institute for Entrepreneurship*, a local non-profit 501(c)(3) community development organization led by Mr. Michael Jackson. Mr. Jackson grew up in *Baptist Bottom* and after many years in Detroit, returned to Dothan with the mission of making a real difference in the neighborhood of his youth. Over the past 9 years, he has remained true to his mission through tireless efforts to raise funds for ongoing operations, develop educational programs, teach environmental lessons to school children groups; mentor neighborhood children, and plant, tend and harvest the fresh foods. Mr. Jackson has never relied on the Community Garden's cash flow to supply him with personal income, and has always put the Garden's financial needs first. The DuBois Institute recognizes that poverty is the underpinning of disparities in society and often acts as a multiplier in numerous key prevalence rates (access to health-care, food, housing, education and chronic diseases). They seek to encourage entrepreneurship as a strategy to mitigate poverty. Throughout its history, the DuBois Institute has dedicated itself to finding ways to close disparity gaps in the community by focusing on programs that impact lower socio-economic neighborhoods. From small business symposiums to tobacco prevention projects, the organization has been successful in numerous local and state campaigns.

The Institute expanded its outreach to advocate against childhood obesity by launching *Aunt Katie's Community Garden and Urban Farm* in 2010. The role of the Garden is to help reduce childhood obesity; boost economic opportunities at the neighborhood level; improve access to healthy local food, promote wellness; and create a walkable, healthy, and economically vibrant neighborhood. The first community garden in Dothan, the half-acre site is used for both high-density food production and as a community garden for local gardeners. The project leverages community involvement to "*Teach, Entertain and Inspire*" children and their families to learn about "real food"; to discover that food production can be beautiful, healthy, and enhance the quality of life, and to volunteer. The Garden has made a huge impact on the *Baptist Bottom* neighborhood. The associated FoodLife Center, a marketplace for fresh, affordable food, has been an immediate benefit from *Aunt Katie's Community Garden*, as produce, organic honey, and other agriculture-based products raised/developed at the Garden site are sold. The Dubois Institute plans to expand their work to launch more school-based gardens, thereby encouraging broader integration of good education into the academic curriculum of the local school system. In addition, Dubois Institute's formula for garden-based learning and nutrition education has

resulted in a partnership with Auburn University's Nutrition Education Program, which includes SNAP-Education outreach.

The Community Garden leadership plans to expand the garden footprint onto the adjoining former electrical substation priority brownfield site. Food will be grown in raised bed and tunnel houses with soils imported from other sources rather than planting in the ground, building upon the success of these techniques at the existing adjacent Garden property. These high-production techniques result in the growth of vegetables equivalent to 3 acres of farmland, which is a remarkable achievement for such a small inner city site. Using raised beds will also prevent exposure to contaminants found in subsurface soils on the site. Produce is already sold to area farm-to-table restaurants, and the construction of additional tunnel houses will help meet the established demand.

The Garden expansion project has strong alignment with other **revitalization strategies** already in place. Dothan has already utilized the Community-wide Assessment Grant to characterize contamination on the target property, therefore, cleanup activities would expand on the brownfield initiatives currently underway. The site is also located within the targeted area described in that grant application, specifically in Census Tract 406, which is already eligible for Community Development Block Grant (CDBG) funding. Locally, this area is known as the *Baptist Bottom Neighborhood*. The City's 2010-2030 Long Range Plan, which was formulated through community outreach and visioning sessions, is also aimed at revitalization of the inner core of Dothan where the property is located. The City's Long Range Plan has several primary goals that dove-tail with EPA's brownfields funding objectives and livability principles. These goals include: improving quality of life in the targeted area, improving community health, improving housing quality, improving the environment, and creating job opportunities for local residents in the target area. As discussed in greater detail in *Section 2, Dothan solicited extensive input from members of the community to help identify the goals of the Long Range Plan.*

In addition to the Long-Range Plan, the City is presently engaged with neighborhood leaders who are in the process of obtaining a 501(c) 3 non-profit status for the **Baptist Bottom Community Improvement Association,** a Community Development Corporation (CDC). District 2 City Commissioner Janasky Fleming is leading the CDC initiative. The City is assisting by revising certain zoning requirements to facilitate small *Baptist Bottom* neighborhood businesses, and to streamline permitting and other City requirements for new businesses. The City's CDBG program has made significant investment in the *Baptist Bottom* neighborhood including past grants for sidewalk improvements, funding for Habitat for Humanity's weatherization program, various non-profit programs supporting disadvantaged youths, and several grants to *Aunt Katie's Community Garden*. In late 2018, the City finalized the ***Dothan Strategic Affordable Housing Implementation Plan*** (see:*http://www.dothan.org/DocumentCenter/View/5799/Affordable-Housing-Plan-Final-Draft*) **.** Conducted by APD Urban Planning and Management, LLC of Atlanta, the plan provided analysis of 14,000 parcels "*Inside the Circle*" in Dothan. Among the many conclusions and recommendations of the plan is the glaring conditions report showing *Baptist Bottom* with the greatest concentration of blighted conditions in the entire City. The Plan's recommended "**Priority Project Area 1" is the *Baptist Bottom* neighborhood** with 35% of all parcels being either blighted or vacant. The City is currently developing a strategy to begin addressing Priority Area 1 while nearing completion of a 55-unit low-income senior housing development in another blighted neighborhood known as the NBCAR Historical District. The $14 million project is funded largely by Low-Income Tax Credits and various state and Federal Historic Tax Credits due to the development's inclusion of a historical school building's restoration and conversion into 22 apartment units. The City will seek opportunities for similar developments in the Baptist Bottom neighborhood.

These City and community non-profit initiatives show committed involvement and clear alignment between the cleanup of the electrical substation for Garden expansion and the target area's revitalization plans in an impoverished community that has experienced flooding.

ii. Outcomes and Benefits of Reuse Strategy: Cleanup of the former electrical substation for expansion of *Aunt Katie's Community Garden* will create numerous outcomes and benefits. A vibrant "local foods" movement, which insists on more direct connections between farmers and consumers, is emerging across the US. There are several key factors underscoring the importance and benefits of a robust local food system in low-income communities: (1) community members can know the source of their food; (2) the community becomes more self-reliant; (3) overall health is improved; and (4) economic development is expanded at the neighborhood level. Cleaning up and transforming the target site from an undeveloped, contaminated property to a greenspace and recreational property for non-profit purposes satisfies many of the criteria prioritized by EPA Brownfield Program, as listed in the table below. Redeveloping a contaminated former substation site that will not currently support plant growth for community garden use will create a "**working greenspace**", pairing the proven benefits of greenspace development with the production of healthy, locally produced organic foods while also engaging the local residents. The willingness of local farm-to-table restaurants to purchase food from the Garden if the tunnel houses can be constructed on the cleanup site will provide an income stream for the Garden to sustain operations, and represents a tremendous opportunity to teach *Baptist Bottom* residents about entrepreneurship and economics. While many of the details of the reuse plan and expected outcomes are presented elsewhere in this proposal, an initial summary detailing benefit alignments with *EPA strategic objectives* and with Dothan's *Strategic Plan* is provided below:

Action	Outcomes/Benefits	Alignment with EPA Desired Outcomes	Alignment with Dothan Strategic Plan
Conduct Community Meetings	Addresses environmental concerns; engages local residents in decision process; promotes objectives of the Garden.	Community engagement	Community engagement
Enter Site into ADEM VCP and use ADEM technical resources	Engages state agency in the process; facilitates rapid approvals; liability protection for new owners; leveraging of ADEM assessment funds.	State Agency buy-in; leveraging	Creating partnerships
EPA Engagement	Ensures alignment of EPA funding objectives with redevelopment.	Effective use of funding	Creating partnerships
Partner Engagement	Provides resources for construction of garden expansion; expands/promotes benefits of brownfield redevelopment/resuse.	Community engagement; leveraging	Creating partnerships
Remove Contaminated Soils	Removes blight, removes environmental contaminants and reduces future exposure; returns site to productive use.	Improves environment	Improving quality of life, community health, and environment.
Construct Garden Extension	Encourages volunteerism; engages locals in productive work; physical exercise.	Community engagement; improves public health	Improving quality of life and community health; creating job opportunities for local residents.
Plant, Maintain and Harvest Garden	Connects vegetable harvest to effort expended; physical exercise; educates residents on the food cycle, provides fresh produce in food desert; improves health' promotes entrepreneurship by selling of products.	Community Engagement; improve public health	Improving quality of life/ community health, creating job opportunities for local residents, teaching entrepreneurship, creating income stream for Garden operations.

As demonstrated above, the cleanup grant funding coincides well with the *redevelopment plans envisioned for the site* and in particular, the *Baptist Bottom* target area neighborhood. Benefits to this long-overlooked neighborhood from the expansion of *Aunt Katie's Community Garden* and its many outreach programs are significant. As the story of the Garden grows, people from all socio-economic backgrounds in the greater Dothan area are increasingly drawn to the Garden, and by doing so gain exposure to the *Baptist Bottom*. Many have never visited this neighborhood and have the erroneous opinion that it's unsafe. But because they now go there to purchase fresh greens, vegetables and honey, they also see the great need within the surrounding neighborhood and more importantly, the good citizens trying to make the *Baptist Bottom* a better place. This helps to change perceptions and bring needed additional resources to the neighborhood.

In addition, the proposed reuse will result in a *reduction in carbon emissions* by providing a readily available local source of fresh food within walking distance of many local residents, thus reducing dependence on driving vehicles to grocery stores located outside of the local "food desert". The Garden will depend on *solar energy* to thrive, and no other energy sources are anticipated to be required. *Greenspace and recreational space* will be created for non-profit use, in addition to teaching *economic development*. While not directly located in an Opportunity Zone, the *Baptist Bottom* neighborhood immediately abuts one to the east, and there is no doubt that economic activity will increase in this adjacent Opportunity Zone as people are lifted out of poverty through the planned revitalization efforts. *These features and benefits point to a unique and successful outcome from a brownfields cleanup action.*

1.c Strategy for Leveraging Resources

i. Resources Needed for Site Reuse: There are many sources of leveraging that Dothan is currently or will be drawing from in order to facilitate cleanup and redevelopment of the target property. **Committed leveraged resources**, **in the amount of $37,748**, include:

- Former Mayor Mike Schmitz, owner of Schmitz Automotive Group, is donating **$7,000** for the construction of tunnel houses to grow plants after the cleanup is complete *(see support letter in Attachment A).*
- David Johnson, a local retired electrical engineer and long-time supporter of the Dubois Institute and the Garden, is donating **$7,000** for the additional Garden extension after cleanup *(see support letter in Attachment A).*
- Mark Saliba, president of Mark Saliba Corporation (local contractor) and current Mayor of Dothan, oversees the Saliba Foundation, and has also pledged **$500** for the construction of tunnel houses *(see support letter in Attachment A).*
- The City's 2017 EPA Brownfields Community-Wide Assessment Grant will be used for cleanup planning, finalization of the draft Analysis of Brownfields Cleanup Alternatives (ABCA), and collection of additional soil samples to determine background arsenic concentrations in the Garden area, at an estimated amount of **$9,500**. This grant has already been used to conduct Phase I and II ESAs on the site, facilitate community meetings, and develop a draft ABCA.
- Dothan recently installed a chain link fence around the property to prevent access at a cost of **$5,248**, which will remain after cleanup *(see purchase order in Attachment A).*

- ADEM is already providing resources for this project and the current assessment grant by facilitating visioning events with the impacted communities. Dothan has requested ADEM Section 128(a) technical assistance for additional sampling at the site to further determine the extent of arsenic impact prior to cleanup, which ADEM has indicated they will fund if possible as the project develops *(see support letter in Attachment A).* Funding is estimated at **$8,500.**
- The Dubois Institute for Entrepreneurship (non-profit creator of the Community Garden) has provided, and will continue to provide, on-site facilities for public meetings and community education *(no dollar amount assigned, but this serves as an important resource).* They will continue to seek commitments for construction materials and labor for building tunnel houses on the target site, in addition to those already secured above.

Anticipated additional leveraged resources that will help augment the committed resources listed above include:

- The Dubois Institute has received $67,500 in funding from the City's CDBG to redevelop a dilapidated structure on the Garden site for education classes, as well as $22,500 for administration of the non-profit organization. Though not quantified at this time, additional CBDG funding is anticipated in the 2021 budget.
- The Wiregrass Foundation provides $4 million per year to non-profits in the Wiregrass Region, where Dothan is located. The Foundation has already provided $50,000 in funds to the Dubois Institute, including $25,000 recently donated to renovate the Community Garden education center *(see letter in Attachment A).* The Institute will seek additional funding from the Foundation to continue their efforts to impact the community with the Garden.

ii. Use of Existing Infrastructure: Sidewalks along Chickasaw Street provide convenient *walkability* access to the Garden for *Baptist Bottom* residents, including those residing in a large public housing development near the site. The low-impact reuse strategy and end use for the site will not require the installation of new infrastructure, and will only require access to water for the watering of plants in the raised beds and tunnel houses during dry times. City water is already available at the adjacent Garden site, which will be utilized on the expanded garden.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

i. The Community's Need for Funding: *Aunt Katie's Community Garden* is located in Census Tract 406, which is within Dothan's Enterprise Zone and CDBG area. According to the *2011-2015 American Community Survey on American Fact* Finder, this **small population, low-income minority neighborhood of approximately 2,200 residents** comprising *Baptist Bottom* faces extensive challenges when compared to national, state, and county average statistics. Key significant statistical disparities of Baptist Bottom residents to national metrics are as follows:

- 55% of families living below the poverty line- *four times the national average*
- Unemployment rate of 10.9%, *twice that of the national average*
- 30% housing vacancy rate vs. 12% national average
- 30% of residents with no means of transportation
- Per capita income of $9,807-*three times below the national average*
- 47% of residents on food stamps

The following glaring quote taken from the *Affordable Housing Study* referenced in *Section 1.b.i* offers a sobering statistic:

"Throughout community engagement and outreach activities, participants cited Baptist Bottom (within Project Priority Area 1) as an area with blight due to the high number of homes in bleak condition and the prevalence of vacant lots. Synonymous with these statements, this area has a high concentration of blighted and vacant lots. A tenth (12% or 84 properties) of all single-family homes are in blighted condition within the area. Additionally, over a fifth (23% or 285 properties) of all properties are classified as vacant lots within the area."

A substantially higher percentage of sensitive populations also live in the *Baptist Bottom* census tract, including 9.2% under 5 years of age, and **82.5% minority**. All of this may be indicative of an *environmental justice* issue in the area. This community does not have the resources or funding to address environmental remediation and redevelopment, and the cleanup of the former electrical substation is highly unlikely without award of a cleanup grant.

ii. Threats to Sensitive Populations

(1) *Health or Welfare of Sensitive Populations*: The condition and threats to sensitive populations in the **Baptist Bottom target area** (Census Tract 406) have already been identified in the Community-wide Assessment Grant activities. Blight is highly prevalent throughout the *Baptist Bottom* neighborhood, as evidenced by the numerous abandoned buildings and houses with broken windows choked by overgrown vegetation. Now in the second generation since families began leaving the neighborhood, many who inherited properties live in other cities across the US. Most have no interest in the inherited property nor the neighborhood and allow the blight and unkempt conditions to continue. The deteriorated condition of these structures has contributed to lower property values as evidenced by US Census data. The City has safety concerns associated with these brownfields, and environmental concerns associated with these structures are prevalent due to the likely presence of asbestos and lead-based paint. Children find abandoned houses as interesting places to play, exposing them to friable lead-based paint and the associated health dangers. These abandoned structures have also become magnets for vagrancy and criminal activity. When owners are located and contacted by the City and informed of such conditions, most refuse to take action to secure or improve the property. Similarly, local slum

lords often rent these shacks to disadvantaged folks who have limited housing options. Renters are therefore exposed to lead-based paint and placed at risk of health from their dwelling. The City of Dothan is developing a rental registry ordinance intended to combat this health threat by requiring city inspections for housing code compliance prior to occupation by a renter. The Dothan Police Department mined their database of arrest reports to determine where the highest percentage of crimes had been committed in relationship to existing brownfield sites. Statistics from the Department show that crimes were clustered around properties listed in the City's GIS brownfield inventory. City data shows numerous crimes committed within 550 feet of brownfields sites including *the target site*. *Neighborhood Scout* also confirmed that the city center, where the Garden and most of the brownfield sites are located, has a much higher crime rate than the rest of the City. Violent crime was reported to be nearly four times higher within the City center than compared to Dothan as a whole (15.9 versus 4.0 per 1,000 people). Property crimes were more than double for the target area when compared to Dothan (64.8 versus 31.7 per 1,000 people). There is also a lack of transportation and other public services in the target area, with over 30% of households in the target area having no vehicle. The US Department of Health and Human Services also indicates that there are no federally-qualified health centers in the target area. The US Census and CARES data for 2014 indicate a shortage of grocery stores with a rate of 15.76 per 100,000 compared to the US rate of 21.1 – indicative of a "*food desert*".

We reached out to Cory Kirkland, Brownfields Steering Committee Member and Administrator for the Houston County Health Department, for other health statistics specific to the *Baptist Bottom Neighborhood*. Mr. Kirkland stated that, unfortunately, he has never had the funding resources to conduct needed studies specific to segments of the County's population known to be at high risk of health. If awarded this cleanup grant, the City could fund a limited study of *Baptist Bottom* health concerns in partnership with our local medical School, The Alabama College of Osteopathic Medicine; and/or conduct a *Community Health Assessment* (other eligible activity) using funds from award of a 2020 Community-Wide Assessment Grant that Dothan is pursuing separately from this cleanup grant.

(2) ***Greater Than Normal Incidence of Disease and Adverse Health Conditions***: In their 2007 report, *Indicators of Health Status in Alabama*, the Alabama Department of Public Health reports that the Southeastern Alabama Wiregrass Region (which includes Dothan) has the second highest cancer rate in the state (26% higher than the national average). Some types of cancer, such as ovarian cancer, are 30% higher than the national average and 15% higher than the state average. Neurological disorders are even worse. The rate of Alzheimer's disease is 42% higher than the state average and 93% higher than the national average. Chronic respiratory diseases in Houston County are reported to be approximately 19% higher than that of the national average. Infant mortality is 24% higher in Houston County than the national average, and African Americans in Houston County have a 15% higher infant mortality rate than Caucasians. Of post-neonatal deaths, African Americans have a 600% greater death rate than Caucasians in Houston County. According to 2013 CDC and Houston County data, low birth rates in Houston County were 46% higher than that of the US average. While we do not currently have health statistics specific to *Baptist Bottom,* we do know that the area is over 82% African American, and it is likely that these dismal regional health statistics would be experienced by the majority minority residents in this neighborhood. While health concerns for these neighborhood residents has not been considered to be a priority of others, the City has identified an avenue for conducting that task as an outreach component under the cleanup and the assessment grants, if awarded.

Scorecard.com reports that across the US, 2.2% of all preschoolers have enough lead in their blood to reduce intelligence and attention span, cause learning disabilities, and permanently damage a child's brain and nervous system. With as much as two-thirds of the homes in the target area constructed prior to 1960 (according to the US Census), lead-based paint is another cumulative environmental issue that needs to be addressed. The City of Dothan recently concluded an exhaustive affordable housing study. That report revealed that 35% of all parcels in *Baptist Bottom* are dilapidated and/or vacant. The existing industries in the area may also have negative health implications according to the Office of Primary Care and Rural Health, Alabama Department of Public Health. Data indicate that approximately one in every ten Alabama residents currently has asthma, that asthma prevalence rates are increasing, and that the state's rates for both lifetime and current asthma now exceed those for the U.S. as a whole. Although it is found within all subcategories of the population, the burden of asthma is unequally borne by children, females, African Americans, and those with low income and educational levels – such as those living inside the target area. These data also revealed that asthma rates for African Americans in Alabama average three percentage points higher than that of whites. Lastly, according to the Alabama Department of Public Health, current asthma prevalence in children in Alabama is 11.2% compared to the National rate of 8.9%. Deplorable housing conditions that expose inhabitants to a combination of elements including lead-based paint, roach infestations and poorly heated and cooled living conditions would reasonably contribute to the health disparity. *Baptist Bottom* children and the elderly are at greater risk and likely have a significant impact on the serious county health statistics contained in this narrative. Some of these health problems could be associated with exposure to hazardous substances or petroleum contamination, and cleanup of the former electrical substation will certainly remove exposure to the arsenic already proven to be present at the site.

(3) ***Disproportionately Impacted Populations***: According to US Census Data, the minority population living in the Baptist Bottom Census Tract is nearly triple that of the US average. The target area contains **four times** the national average for the number of families living in poverty, with a per capita income between **2 to 3 times less** than the national average. This suggests many of these people really are "working for peanuts" in the peanut capital of the world. In addition, there are numerous cumulative environmental issues that have impacted the greater community associated with industrial, commercial, and governmental operations that appear to represent potential *environmental justice* issues. According to *scorecard.com*, Houston County is in the 90th percentile for having the worst air quality in the US for developmental toxin releases. Houston County is also ranked in the 90th percentile for having the worst land releases in the US. Lead and asbestos exposure is also a strong concern in the targeted area due to the prevalence of

blight and older structures. In addition, storm water and wastewater contribute to the overall cumulative environmental issues. Dothan is currently under a Consent Order from EPA to address sanitary sewer overflow issues. Also, two major railroads run right through the targeted community generating concern for potential contaminated runoff from years of herbicide application at the railroad sites, as well as various nearby brownfield sites. Contaminants, such as benzo(a)pyrene and tetrachloethylene (PCE), have shown up in the municipal water supply. Although these contaminants are currently below EPA maximum contaminant levels (MCLs), they are an indicator that contaminants are mobile and are migrating into the drinking water supply from brownfield sites and industrial and commercial properties such as abandoned gas stations and dry cleaners. Cleanup of the former electrical substation will eliminate the potential for arsenic impact to target area residents.

2.b. Community Engagement

i. *Project Partners*, and, **ii. *Project Partner Roles***: The interest in and support of *Aunt Katie's Community Garden* and the proposed cleanup actions has received significant support from the community and other project partners. The City of Dothan has hosted two separate community meetings (January and November, 2019) at the Garden to discuss the cleanup grant and proposed Garden expansion onto the impacted site. The City has led the cleanup initiative, and the Garden expansion has been led by *The Dubois Institute for Entrepreneurship* (Michael Jackson, mjackson@dife.us; 334-403-1765), a fully functional and effective community partner in full swing at the target property who has worked tirelessly to engage and improve the *Baptist Bottom* community. The Institute operates the Garden, and has been very effective in garnering community support and securing partners for expansion of the Garden and the construction of the additional raised bed and tunnel houses on the target property after cleanup. Community project partners/supporters who have donated cash, labor, in-kind donations, and other resources to the Garden include *Rankin Construction Company* (Bruce Rankin, 334-792-8172); *Bowen Pharmacy* (Tina Stringer, 334-794-4211); *Houston Seat Cover*, (334-792-5003); *Glass Doctor*-Dothan, (334-794-0729); *Don McCleod Foundations, Wiregrass Foundation* (Barbara Alford (334-699-2472); *Southeast Alabama Community Foundation* (Millie Armstrong, milie.armstrong@sacfinfo.org, 334-446-0247); *Reverend Shirley Reeves*, and numerous other individuals. Individual supporters along with this *diverse group of corporate partners and non-profits* combine to provide *Aunt Katie's Community Garden* with the support and resources vital to the continued operations and expansion of the Garden. Just as important as the City's Brownfield Project Outreach is the outreach from the Garden to residents of the neighborhood. The Garden's expansion of tunnel house operations onto the cleanup site will increase its ability to engage school children groups for urban agriculture education and encouragement for consuming fresh foods. The expansion also increases outreach by providing year-round vegetables to *Baptist Bottom* residents in need.

iii. Incorporating Community Input: Dothan developed a Community Involvement Plan (CIP) as a part of the current 2017 brownfield assessment grant. Additionally, community involvement has been a cornerstone of the success of the City's Long Range Plan for over seven years. ADEM hosted a visioning session to address brownfield redevelopment. The public has been enlisted to help shape the future of Downtown Dothan via surveys on utility bills, the City website, and a series of articles in the local newspaper. After receiving over 1,700 responses, Dothan was able to incorporate the citizens' desires into the planning process for downtown revitalization and job creation.

This success continued with two well-attended public meetings in the last 12 months: the first in January 2019, and the most recent on November 13, 2019, both held in *Baptist Bottom* at the Community Garden site. **Neighborhood residents, supporting partners**, **Brownfield Project Steering Committee members, City officials, and local press members attended and gave input**. The proposed *Aunt Katie's Community Garden* expansion has been presented in both meetings. Concerns regarding the impacted soils found during the Phase II ESA at the former transformer site were discussed openly, and the interest level for remediation of the impacted soils and the expansion of the Garden was high. The meeting was advertised via print media in advance. City staff provided on-camera interviews regarding the project a week prior to and immediately following the meeting, and the City's public Information Officer distributed a press release to further promote awareness and attendance. A draft of the ABCA/grant application was available for review. No objections to the project were raised, and Dothan is confident that we have full community support for the cleanup and expansion. An additional meeting will be held prior to scheduling of construction activities, which will be advertised through the previous effective methods including website updates, social media posts, direct responses by phone, or meetings and email based on the preferences of the inquirer. Monthly briefings will be posted on the brownfield section of the City website and on the Garden's bulletin board and social media pages as the project progresses. Once cleanup is complete, a ribbon cutting ceremony will be held to celebrate the achievement. ADEM and the EPA will be invited to attend the ribbon cutting along with the local community. The above listed past activities and sound plans for the future demonstrate that significant input will be solicited from the local community, partners, and groups, and that that input will be considered and responded to in order to support the project goals and meet the needs of the community.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

A draft ABCA that presented several cleanup alternatives to address the impacted soils at the site was developed. The recommended alternative, based on the findings from the Phase II ESA and discussions with ADEM, includes excavation and landfill disposal of shallow soils impacted by arsenic and PAH, followed by engineering and institutional controls. While additional sampling and a risk assessment may be required by ADEM (using current available assessment grant funds) to further evaluate the contaminant distribution and risks at the site, Dothan has a high level of confidence that such additional work will confirm our current understanding of site conditions. The recommended cleanup will consist of the following:

- Collection of additional samples (*using current assessment grant funds, and resources from ADEM*) to determine naturally occurring (background) arsenic concentrations and to further delineate the area requiring excavation.
- Entry of the site into the ADEM Voluntary Cleanup Program (VCP).
- Preparation of bid documents for the proposed excavation and solicitation of bids from qualified contractors.
- Excavation of the upper 2 feet of soils across the 0.15-acre site; segregation of materials into distinct units, and waste characterization of excavated materials to determine landfill disposal options.
- Collection of confirmation samples from the base and sidewalls of the excavation.
- Transportation of the soils to an approved landfill for disposal.
- Engineering controls, to include placement of a witness barrier to establish a visible boundary between soils greater than 2 feet deep and the clean backfill material.
- Backfilling of the excavation with clean, imported fill and a layer of topsoil, and reseeding with grass.
- Preparation of a final report and placement of restrictive covenants (if required).

To reduce disposal costs, steps will be taken to segregate hazardous soils from non-hazardous soils. The distribution of detected arsenic concentrations were evaluated across the site to estimate the potential volume of soils that would be considered hazardous. This exercise yielded a potential range of 355 to 706 tons of hazardous wastes and an estimated project cost of $297,000 for removal and disposal only. The actual cost of the project is dependent on the volume of excavated material that is deemed hazardous. A full description of the cleanup plan and logic used to estimate the cost is included in the attached draft ABCA. Excavation of metal-impacted soils is a common method of cleanup, and the City is confident in the effectiveness and plausibility of the proposed cleanup method.

3.b. Description of Tasks, Activities and Outputs

The cleanup grant guidelines for this section request that *(i) Project Implementation; (ii) Schedule (iii), Task Activity/ Lead*, and *(iv) Outputs* be addressed. Due to the close relation between these items and for ease of presentation, the City has addressed these criteria in a single table, provided below. This table provides a detailed listing of the major tasks to be completed, the activities/subtasks associated with each task, who will lead task efforts, the anticipated outputs, the schedule for completion, and how Dothan and other teaming partners will contribute to the effort. Projected costs for each of the major subtasks/outputs are included in *Section 3.C, Cost Estimates*. The City is confident that these tasks/activities are eligible for reimbursement and appropriate to meet the project goals.

i. Implementation/ Tasks	Activties/Subtasks	Details		
		ii. Schedule	iii. Lead Entity	iv. Outputs
TASK 1 Project Management/ Reporting	Execute Cooperative Agreement	30 days after award	Applicant	Executed Cooperative Agreement, grant management oversight, contract with an EP, 12 quarterly reports, ACRES database updates, closeout documents
	Grant Management	Continuous	Applicant	
	Select EP	60 days after award	Applicant	
	Prepare EPA Progress Reports	Quarterly	Applicant & EP	
	Travel to Brownfield Conference (1 person)	Year 1	Applicant	
	Final Closeout	30 days after grant closeout	Applicant	
TASK 2 Community Involvement	Update CIP	30 days after award	Applicant and EP	Updated CIP; 3 meetings/ minutes
	Community Mtgs.	Quarters (Q) 1, 4, and 5	Applicant and EP	
TASK 3 Cleanup Planning	Additional Sampling	90 days after award	EP	Final ABCA, meeting with ADEM/minutes, final CAP, bid specification document, qualified bids, selected subcontractor contract documents, VCP application
	Final ABCA	Q2	EP	
	ADEM VCP Mtg.	Q2	Applicant and EP	
	Corrective Action Plan (CAP)	Q3	EP	
	Prepare Bid Documents	Q3	Applicant and EP	
	Subcontractor Selection	Q3	Applicant and EP	
	Enroll in VCP	Q3	Applicant	

TASK 4 **Cleanup Activities**	Kickoff	Q4	Applicant and EP	Kickoff meeting/ minutes, equipment staging, removal of contamination, lab reports, backfilling of excavation, a final cleanup report, restrictive covenant
	Equipment Staging	Q4	EP and Applicant	
	Soil Excavation/ Transport / Disposal	Q4	EP and Applicant	
	Confirmation Sampling	Q4	EP	
	Backfilling	Q4	EP	
	Report Preparation	Q4	EP	
	Restrictive Covenant	Q5	Applicant and EP	

3.c Cost Estimates and Outputs

3.c.i. Cost Estimates: The anticipated budget for each of the above described tasks above, and details on the 20% cost share, is provided in the following table:

Budget Categories		Project Tasks ($) Project Management/ Administrative	Community Involvement	Cleanup Planning	Cleanup Activities	Total
Direct Costs	**Personnel**[1]	$3,000[1]	$1,200[2]	$750[3]	$2,250[4]	**$7,200**
	Travel	$2,500[5]				**$2,500**
	Equipment					
	Supplies		$500[6]			**$500**
	Contractual	$7,500[7]	$3,000[8]	$9,000[9]	$267,300[10]	**$286,800**
	Other					
Total Direct Costs		$13,000	$4,700	$9,750	$269,550	**$297,000**
Indirect Costs						
Total Federal Funding (not to exceed $500,000)		$13,000	$4,700	$9,750	$232,500	**$297,000**
Cost share (20% of requested federal funds)				$31,960[11]	$27,440[12]	**$59,400**
Total Budget *(Direct Costs+ Ind. Costs+Cost Share)*		**$13,000**	**$4,700**	**$41,710**	**$296,990**	**$356,400**

Federal Funding Details

[1] City Grant Manager: $75/hr x 40 hrs. = $3,000
[2] City Grant Manager at $75/hr x 16 hrs. = $1,200
[3] City Grant Manager at $75/hr x 10 hrs. = $750
[4] City Grant Manager at $75/hr x 30 hrs. = $2,250
[5] City Grant Manager travel expenses for attendance at one BF conference: $2,500 *(no labor, only conf. fee, travel/expenses)*
[6] Supplies for public outreach meeting: $500
[7] EP to assist with project mgmt./reporting: $150/hr x 50 hrs. = $7,500
[8] EP to assist with CI plan and meeting attendance: $150/hr x 20 hrs. = $3,000
[9] EP to assist with cleanup planning: $150/hr x 60 hrs. = $9,000
[10] EP for cleanup actions: $150/hr x 100 hrs. = $15,000; + subcontractor to excavate/haul/dispose/backfill ($252,300), for total of $267,300

Cost Share Details:

[11] ADEM VCP Fees: $31,960
[12] City equipment operator ($35/hr x 40 hrs. = $1,400); + City equipment ($55/hr x 40 hrs. = $2,200); + disposal of non- haz. soils in City landfill ($12.50/ton x 300 tons = $3,750); + excavation/disposal costs to EP ($20,090).

3.d. Measuring Environmental Results

The City will carefully track all outputs and outcomes (described in *Section 3.c.ii*) required in EPA Order 5700.A to ensure the grant funds are expended *in a timely and efficient manner*. Upon grant award, these will be clearly identified in the project work plan in a work schedule and will be reported in the quarterly progress reports submitted to the EPA Project Officer as well as updated in the EPA ACRES database. The mechanism for tracking progress has already been established with the Assessment Grant, which includes preparation of a detailed schedule for submittal of draft and final compliance reports with assignments; submittal of project schedules by the EP for each task with each task proposal; weekly communications between project team members via email, phone, and review of technical data via online screen sharing applications to aid in the decision process. If progress is not meeting the new project schedule established for this cleanup grant, countermeasures (meetings with the EP, contractors, ADEM, EPA to establish root cause and

corrective actions) will be implemented to get the project back on track. Key tasks and outputs to ensure the desired environmental results are achieved within the 3 year grant window are presented in the table in *Section 3.b above*.

Anticipated outcomes from the cleanup include liability protection for the new owner; alignment of EPA funding objectives with redevelopment; removal of blight; reduction or elimination of future contaminant exposure; return of site to productive use; encouragement of volunteerism; engagement of locals in productive work and physical exercise; connecting vegetable harvest to effort expended; educating residents on the food cycle, providing fresh produce in food desert; improving community health, and teaching entrepreneurship through the selling of produce raised. These outcomes, and the alignment of them with EPA and Dothan strategic plan objectives are clearly communicated in the table in *Section1.b.ii*.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

i. *Organizational Structure*, and, ***ii. Description of Key Staff***: The Dothan grant management team is already experienced with the EPA brownfield program (for Dothan and other cities). *Bob Wilkerson*, a landscape architect/planner with the Planning and Development Department has been designated to administer the grant. Mr. Wilkerson has over 35 years of professional experience in the disciplines of banking, planning, and urban design and has been a part of several successful EPA Brownfields projects (Cordova, AL, the Freshwater Land Trust in Jefferson County, AL, Regional Planning Commission of Greater Birmingham) and the current successful Dothan Community-Wide Assessment Grant. He is experienced in all aspects of grant management community engagement. Providing backup to Mr. Wilkerson is *Maurice Head*, Senior Planner. Mr. Head has over 30 years of planning and grant management experience including annual management of $3 million to operate the CDBG Program, HOME program, ESG Program, Housing Rehabilitation Programs and other City housing initiatives. He will work closely with Mr. Wilkerson ensuring that all grant compliance requirements are met.

iii. Acquiring Additional Resources: As was done with the Community-Wide Assessment Grant, Dothan will follow all EPA competitive procurement requirements of 2 CFR Part 200 for EP consultant and contractor selection, attempting to utilize Disadvantaged Business Enterprises (DBEs) where possible. Dothan is familiar with all aspects of the EPA contractor solicitation process and employed them during procurement procedures on the recently awarded brownfield assessment grant.

4.b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: In 2017, Dothan was awarded a $300,000 Community-Wide Assessment Grant for hazardous and petroleum sites (BF-00D58117). A significant amount has already been accomplished, as described below.

(1) ***Accomplishments***: The City has already completed numerous outputs for the 2017 assessment grant, including:

- Executed the Cooperative Agreement
- Selected an EP/consultant to provide technical services through an advertised and open solicitation process
- Submitted a grant management work plan to the EPA
- Formed a Brownfield Steering Committee
- Held two Steering Committee meetings
- Completed a CIP
- Updated and prioritized the inventory list
- Completed eight Site Eligibility Determinations
- Conducted eight Phase I ESAs
- Completed four Phase II ESAs (including the Garden site); one Phase III ESA; and one leveraged Phase II
- Prepared and received EPA/ADEM approval of a Generic and three Site-Specific QAPPs
- Entered all Phase I and II data into ACRES
- Submitted all required quarterly and annual reports to EPA
- Held three public meetings

Numerous other brownfield properties exist in this target area, and significant progress is being made toward building a successful brownfield program and moving sites towards redevelopment.

(2) ***Compliance with Grant Requirements***: Assessment grant implementation is well underway, and the City has a complete understanding of what is expected from the EPA and is in full compliance with the terms and conditions of the Cooperative Agreement and the scope and schedule presented in the approved work plan. All required quarterly and annual reports have been submitted on time, and all assessment information has been entered into ACRES. $175,457 (58%) of the awarded $300,000 was spent at 18 months, and $247,303 (82%) at 24 months - well ahead of the EPA targets. All milestones and deadlines have been met, and at the current pace, the City will easily surpass the minimum requirements of the Cooperative Agreement. The grant management team is committed to continuing this success and stewardship upon award of this cleanup grant.

THRESHOLD CRITERIA FOR CLEANUP GRANT

1. Applicant Eligibility: Dothan, AL, incorporated as a City on November 10, 1885, is a unit of local government as defined in 40 CFR Part 31.3, and is an eligible entity to receive EPA Brownfields Cleanup funding.

2. Previously awarded Cleanup Grants: Dothan has never received an EPA brownfields cleanup grant.

3. Site Ownership: The City acquired ownership of the electrical substation site on July 13, 1957 (proof of ownership attached).

4. Basic Site Information: The site is known as the "former electrical substation" site, and is located at the corner of Linden and Whiddon Streets, Dothan, AL 36303. The lot does not have a street address, but it is adjacent to Aunt Katie's Community Garden with an address of 602 Linden Street, Dothan, AL 36303.

5. Status and History of Contamination at the Site: The site consists of a 0.15-acre vacant parcel of land located in an area of mixed commercial and residential use. It is commonly known as the "former electrical substation", and is located immediately adjacent to the existing Aunt Katie's Community Garden, who plans to acquire the property after cleanup to expand of the Garden. The property was developed and used as an electrical substation by Alabama Power from 1961 until at least 1997, and has remained vacant since at least that time. Pedestrians, including children, frequently walk across the site and play on the property. Soils in the center of the property have been unable to support the growth of vegetation since the removal of the substation around 1997. Arsenic and semi-volatile organic compounds (SVOCs) were found during assessment activities at concentrations that exceed Residential Regional Screening Levels (RSLs). No polychlorinated biphenyls (PCBs) above action levels were found. Although there is no obvious use of arsenic at an electric substation, a possible explanation may be that arsenic was used to control rodents in an effort to minimize potential damage to electrical lines, or as an herbicide to control weeds. It is also possible that the arsenic is associated with use of wood products treated with copper-chromium-arsenic (CCA), which would explain the elevated SVOC concentrations as well. The primary contaminant of concern (COC) at the site is arsenic, which is likely above RSLs over the entire property to a depth of 4 feet. There is the potential for dermal, inhalation and ingestion of contaminants by local residents and workers at the Garden once it expands onto the property. The area of impact is estimated at approximately 7,000 square feet to a depth of 4 feet. Refer to the draft Analysis of Brownfields Cleanup Alternatives (ABCA) for a more detailed description of the site history and contamination.

6. Brownfields Site Definition: The site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the U.S. government.

7. Environmental Assessment Required for Cleanup Proposals: A Phase I Environmental Site Assessment (ESA) was conducted at the site (report date of February 26, 2018) and a Phase

II ESA (report date of September 17, 2018) using funds from an EPA Brownfields Community-Wide Assessment Grant awarded to Dothan in 2017. The Phase II ESA revealed the presence of arsenic and SVOC- impacted soils at the site.

8. Enforcement or Other Actions: There are no ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is requested. There also are no inquiries or orders for federal, state, or local government entities that we are aware of regarding the responsibility of any party (including the City) for the hazardous substances at the site.

9. Property-Specific Determination Information: This site does not require a Property-Specific Determination.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

CERCLA Liability Exception Status (Site Acquired Prior to January 22, 2002)

Dothan's eligible for brownfield cleanup grant funding as we qualify for **CERCLA Liability Exception Status** under Section 7 of the BUILD Act because the property was acquired prior to January 11, 2002. Supporting information is as follows:

- The property was acquired from Alabama Power Company on July 13, 1957 as a part of a multi-parcel transaction involving similar lots throughout the City.
- The City of Dothan never conducted any operations at the site. The electrical substation was built by Alabama Power Company in 1961, operated until approximately 1997, and dismantled in approximately 2003. No releases were ever reported at the site, and impact was first discovered during the Phase II ESA conducted in September 2018. The City of Dothan did not cause or contribute to the release or disposal of hazardous substances at the site.
- Dothan has never arranged for the disposal of any hazardous substances from the site, nor transported hazardous substances to the site.

Based on this information, Section i, *Exemptions to CERCLA Liability*; Section ii, *Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability*; Section iii; *Landowner Protections from CERCLA Liability* do not apply.

11. Cleanup Authority and Oversight Structure:

a. Describe how the City will oversee the cleanup of this site. A draft analysis of brownfield cleanup alternatives (ABCA) that presented several cleanup alternatives to address the impacted soils at the site was developed. The recommended alternative, based on the findings from the Phase II ESA and discussions with the Alabama Department of Environmental Management (ADEM), includes excavation and landfill disposal of shallow soils impacted by arsenic and SVOCs, followed by engineering and institutional controls. The City has significant experience with retaining technical expertise to assist with complex projects, and will retain a qualified Environmental Professional firm to develop a corrective action plan and cleanup the site. The City

will ensure that all procurement actions are undertaken in accordance with City, state and federal procedures, including the competitive procurement provisions of 2 CFR 200.317 through 200.326. The recommended cleanup will consist of the following:

- Collection of additional samples (using current assessment grant funds, and possibly resources from the Alabama Department of Environmental Management [ADEM]) to determine naturally occurring (background) arsenic concentrations and to further delineate the area requiring excavation.
- Entry of the site into the ADEM Voluntary Cleanup Program (VCP).
- Preparation of bid documents for the proposed excavation and solicitation of bids from qualified contractors.
- Excavation of the upper 2 feet of soils across the 0.51-acre site; segregation of materials into distinct units, and waste characterization of excavated materials to determine landfill disposal options.
- Collection of confirmation samples from the base and sidewalls of the excavation.
- Transportation of the soils to an approved landfill for disposal.
- Placement of a witness barrier to establish a visible boundary between soils greater than 2 feet deep and the clean backfill material.
- Backfilling of the excavation with clean, imported fill and a layer of topsoil, and reseeding with grass.
- Preparation of a final report and placement of restrictive covenants (if required).

To reduce disposal costs, steps will be taken to segregate hazardous soils from non-hazardous soils. The distribution of detected arsenic concentrations were evaluated across the site to estimate the potential volume of soils that would be considered hazardous. Excavation of metal-impacted soils is a common method of cleanup, and the City is confident in the effectiveness and plausibility of the proposed cleanup method.

b. Cleanup response activities: Since the City already owns the property, access to adjacent properties will not be required. However, a community meeting will be held prior to conducting excavation activities to inform area residents of the construction activities and to address any concerns that may be raised. Two public meetings have already been held to announce the project. The entire work area has already been secured with fencing.

12. Community Notification:

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): A copy of the draft grant application, along with a draft ABCA was provided for review at November 13, 2019 public meeting, as well as instructions on where the documents can be reviewed by others prior to submittal of the proposal.

b. Community Notification Ad: The City provided public notification that meet all EPA requirements regarding intent to apply for this cleanup grant via three methods. Two community meetings were held in the target community at *Aunt Katie's Community Garden*. The most recent community meeting was held on November 13, 2019 at 10:00 am. This event was advertised on the Community Garden's Facebook page, and proof of this notification is attached. In addition, Alan

Rockwell, a well-known and respected employee for the City of Dothan Building Inspection Department who has built great relationships with residents of the target community, went door-to- door in the neighborhood to inform the community of the meeting. A community meeting was also held on January 8, 2019 regarding the project, and proof of that notification is also attached.

c. Public Meeting: The public meeting was held on November 13, 2019 at 10:00 am at the adjoining Aunt Katie's Community Garden education building to receive and address public comments. A copy of the draft grant application, along with a draft ABCA was provided for review at this meeting, as well as instructions on where the documents can be reviewed by others prior to submittal of the proposal.

d. Community Notification Documents: Proof of the advertisement for the community meeting, meeting notes, sign-in sheet, questions asked and responses, and a copy of the draft ABCA is attached. No written questions were received.

13. Statutory Cost Share: Dothan understands that we are required to provide a 20% cost share for the total federal cleanup funds awarded in the form of a contribution of money, labor, material, or services from a non-federal source. Total clean-up costs are estimated at $356,400. Dothan is requesting $297,000 from the EPA for the cleanup grant, and the Dothan City Council has already passed a resolution (draft attached) committing $59,400 to meet the required 20% cost share. This cost share will be met by providing the following:

- In-kind services, consisting of:
  - City equipment operator ($35/hr x 40 hrs. = $1,400)
  - City equipment ($55/hr x 40 hrs. = $2,200)
  - Disposal of non-hazardous soils in City landfill ($12.50/ton x 300 tons = $3,750)
- Payment of $31,960 to the Alabama Department of Environmental Management (ADEM) for entry into the Voluntary Cleanup Program.
- Payment of $20,090 to the selected Environmental Professional for cleanup services.

These items are all eligible to meet the required $59,400 cost share. A hardship waiver for the cost share is not being requested.

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 12/02/2019

4. Applicant Identifier: City of Dothan

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Dothan, Alabama

* b. Employer/Taxpayer Identification Number (EIN/TIN): 63-6001243

* c. Organizational DUNS: 0720968290000

d. Address:

* Street1: 126 North Andrews Street
Street2:
* City: Dothan
County/Parish: Houston
* State: AL: Alabama
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 36303-4837

e. Organizational Unit:

Department Name: Planning and Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.
* First Name: Robert
Middle Name:
* Last Name: Wilkerson
Suffix:

Title: Planner II

Organizational Affiliation: City of Dothan Employee

* Telephone Number: 334-615-3415
Fax Number:

* Email: bwilkerson@dothan.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-19-07

* Title:

FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

1234-Target Area of Brownfields Cleanup Gra | Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Brownfields Cleanup Grant, Hazardous Substances Former Electrical Substation, Corner of Linden and Whiddon Streets, Dothan, AL 36303

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: AL-002 * b. Program/Project: AL-002

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2020 * b. End Date: 09/30/2023

18. Estimated Funding ($):

* a. Federal	500,000.00
* b. Applicant	100,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Robert

Middle Name:

* Last Name: Wilkerson

Suffix:

* Title: Planner II

* Telephone Number: 334-615-3415 Fax Number:

* Email: bwilkerson@dothan.org

* Signature of Authorized Representative: Robert W Wilkerson * Date Signed: 12/02/2019